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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,

Plaintiff,

vs.

RIOT GAMES, INC.,

Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S PRE-LITIGATION
DISCOVERY REQUESTS AND RULE 26(F)
CONFERENCE PREPARATION

Dated this: FEBRUARY 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

**PLAINTIFF'S PRE-LITIGATION DISCOVERY REQUESTS AND RULE 26(F)
CONFERENCE PREPARATION**

Dear Josh, Aron, and Team at Greenberg Glusker LLP,

Further to my previous correspondence with Josh on 2 January 2025, in which I shared a preliminary list for pre-litigation discovery, I am providing an updated and more detailed list of items for consideration ahead of our Rule 26(f) conference under the Federal Rules of Civil Procedure (FRCP). I hope this document will assist in preparing for our meeting scheduled for 13 February 2025 via Zoom.

Additionally, I request that Riot Games facilitate and cover the costs of my travel to Los Angeles to accommodate any in-person meetings that may be required.

Below, I outline the specific information and materials I request to be disclosed or addressed:

1. Development Timeline and Evidence

1.1 Provide a full and accurate timeline, with supporting evidence, of the development of Arcane. This will be cross-referenced with evidence I hold.

1.2 I have reason to believe that Arcane (in its Bloodborg form) was greenlit by Nicolo Laurent in mid-2020 and development commenced shortly thereafter.

1 1.3 Provide a detailed timeline and evidence of the creation of Riot's 10th
2 Anniversary video, reportedly developed at Fortiche (Paris) in the summer of 2019 as part of an
3 effort to test audience interest and secure early backing for the series. This includes:
4

5 A list of all individuals and companies involved in producing this video.
6

7 Dates, roles, and responsibilities for all contributors.
8

9 **2. Music Video Timeline**
10

11 2.1 Provide a timeline of the development of the Blood, Sweat & Tears music
12 video featuring Sheryl Lee Ralph, including all storyboard and production materials.
13

14 **3. Riot Forge Submissions**
15

16 3.1 Provide a comprehensive list of all submissions made to Riot Forge, including
17 my Bloodborg submissions dated 15 and 19 April 2020.
18

19 **4. Involvement of Agents, Agencies, and Talent**
20

21 4.1 A full list of external agents, agencies, and individuals involved in Arcane,
22 including:
23

24 Manuscripts solicited.
25

26 Writers, directors, casting agents, and managers consulted.
27

28 Correspondence between Riot Games, Fortiche, Netflix, and other parties.

1 4.2 Provide a complete list of voice actors, the agencies representing them, and
2 details of their casting processes. Specifically:

3 Dates, timelines, and financial records for all casting decisions.

4
5 Statements from cast members regarding their experience, including what they
6 were told about the material's origins.

7 Copies of all Non-Disclosure Agreements (NDAs).

8 4.3 Investigate the involvement of UTA and Curtis Brown Group, who
9 represented key talent in Arcane:

10 Hailee Steinfeld (Vi) – Represented by UTA.

11 Ella Purnell (Jinx) – Represented by Curtis Brown.

12 Katie Leung (Caitlyn Kiramman) – Represented by Curtis Brown.

13 Harry Lloyd (Viktor) – Represented by Curtis Brown.

14
15 Provide a breakdown of how these agencies secured the largest roles in the show,
16 including all financial transcripts, receipts, and other relevant documentation.
17

18
19 **5. Development Metadata**

20 5.1 A record of all email addresses, metadata, and computers used to access
21 Arcane-related files.
22

23
24 **6. Personnel Involvement**

25 6.1 Provide a complete list of individuals and their job roles who worked on
26 Arcane, including:
27

1
2 Riot Games employees.

3 Fortiche Production SAS.

4 Netflix and Tencent Games.

5 Curtis Brown and UTA.

6 Third-party contractors.

7
8 6.2 Minutes of meetings related to Arcane, including board meetings that
9 approved the show.
10

11
12 **7. Financial and Tax Information**

13 7.1 A comprehensive financial breakdown of Arcane, including:
14

15 Production costs.

16 Tax breaks claimed.

17 Pay statements and receipts.
18
19

20 **8. Correspondence and Evidence Preservation**

21 8.1 Correspondence of key personnel, including:
22

23 Christian Linke.

24 Alex Yee.

25 Rowan Parker.
26
27

1 Nicolò Laurent.

2 Jonny Geller.

3 Felicity Blunt.

4 David Lyerly.

5 Melinda Rediger

6 And all others.

7
8
9 **9. Additional Requests**

10 9.1 Access to Riot Games and Fortiche Production servers for data mining
11 purposes.

12 9.2 A timeline for interviews with employees of Riot Games and Fortiche
13 Production.

14 9.3 A copy of all Bloodborg-related materials pinned in writing and storyboard
15 rooms.

16 9.4 A list of cast members under 18 and their parental consent forms.

17 9.5 An anonymous questionnaire for employees involved in Arcane to address key
18 concerns.

19
20
21 **10. Complaints and Investigations**

22 10.1 An official response to the summons sealed on 11 May 2024.

23 10.2 Updates on Riot Games' investigations into hate mail I have received from
24 Rioters, Fortiche employees, and the wider community.

1 10.3 A response to allegations regarding Christian Linke's conduct and the
2 appropriateness of his comments about the "French guillotine."
3

4
5 I hope this document aids in preparing for our Meet and Confer discussion. Below
6 I have provided a checklist, and my notes have been provided to the email.

7 As mentioned previously, I am open to early out-of-court settlements, yet because
8 of the ongoing toll and time proceedings are having on myself and on the M.W. Wolf catalogue,
9 which I haven't worked on since mid- 2024, my lower end of negotiations has shifted to
10 accommodate the extra compensation. I am also willing to assist Riot Games by addressing gaps
11 in their lore and products, provided the ongoing misuse of my intellectual property ceases.
12

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14 Thank you for your attention. I look forward to your response and our meeting.
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17 Kind regards,

18 Marc Wolstenholme
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CHECKLIST FOR PRE-LITIGATION DISCOVERY REQUESTS

1. Development Timeline & Production Evidence

☐ Provide a complete and accurate timeline of Arcane's development, including documentation from all stages.

☐ Provide all evidence related to the conceptualization and greenlighting of Arcane (including Bloodborg references) by Nicolo Laurent and other decision-makers.

☐ Provide a breakdown of all failed projects and pilot materials that were reworked into Arcane.

☐ Provide all internal communications discussing audience testing and feasibility studies for Arcane, including:

The 10th Anniversary Video (produced at Fortiche, Paris in Summer 2019).

Marketing strategies used to test audience engagement.

☐ Provide all drafts, storyboards, design documents, and concept art that led to the final form of Arcane.

☐ Provide all Riot Games board meeting minutes discussing the approval and financing of Arcane.

☐ Provide all Riot Games internal memos, emails, or Slack communications referencing the show's production.

Add notes...

1 **2. Copyright & Ownership Evidence**

2 ☐ Provide a complete list of all Riot Forge submissions, including my Bloodborg
3 submissions on 15 and 19 April 2020.

4 ☐ Provide any Riot Games internal correspondence discussing Riot Forge
5 submissions and potential adaptation of external ideas.

6 ☐ Provide documentation of all Riot Games personnel who reviewed or had
7 access to Riot Forge submissions.

8 ☐ Provide a complete list of all agencies, external writers, and consultants hired
9 for Arcane, including their contracts and agreements.

10 ☐ Provide correspondence between Riot Games and any external agencies (UTA,
11 Curtis Brown Group, etc.) discussing story development and character arcs.

12 ☐ Provide all correspondence Riot had with Curtis Brown Group and UTA
13 regarding potential writing or creative contributions.

14 ☐ Provide all Riot Games internal communications discussing the adaptation of
15 new lore elements from external submissions or manuscripts.

16
17 Add notes...

1
2 **3. Casting & Talent Agency Involvement**

3 ☐ Provide the full list of Arcane voice actors, their agencies, and their contracts.

4
5 ☐ Provide records of how each major character was cast, including the selection
6 process and agency involvement.

7 ☐ Provide a detailed financial breakdown of payments to talent agencies (Curtis
8 Brown, UTA, etc.) and their clients.

9 ☐ Provide all NDAs signed by cast members regarding their roles, storylines, and
10 production details.
11

12
13
14 Add notes...

1 **4. Digital Evidence & Metadata Requests**

2 ☐ Provide a full record of email addresses and devices (including metadata logs)
3 that accessed or edited files related to Arcane.
4

5 ☐ Provide all Riot Games internal server logs related to Arcane's development.

6 ☐ Provide all project folders, drafts, and notes pinned in Riot Games HQ and
7 Fortiche Production's writing rooms.
8

9 ☐ Provide records of who was granted access to Bloodborg materials at Riot
10 Forge or other agencies.
11

12 **5. Financial & Legal Documents**

13 ☐ Provide a full breakdown of Riot Games' production budget and financial
14 statements for Arcane.
15

16 ☐ Provide records of tax breaks, subsidies, or external investments related to
17 Arcane.
18

19 ☐ Provide all Riot Games employee NDAs, contracts, and agreements related to
20 Arcane.
21

22 ☐ Provide an itemized list of all expenditures tied to talent recruitment and
23 agency involvement.

24 Add notes...

6. Pre-Litigation Conduct & Bad Faith Actions

☐ Provide all internal Riot Games communications discussing the plaintiff's claims or legal strategy.

☐ Provide documentation of Riot's refusal to engage in good faith pre-litigation discovery.

☐ Provide copies of all communications threatening to dismiss the case instead of addressing claims.

☐ Provide all internal Riot Games legal correspondence regarding this lawsuit, including discussions on legal tactics to suppress evidence.

Add notes...

1 **7. Hate Mail & Workplace Culture Investigations**

2 ☐ Provide all reports, investigations, or internal Riot Games discussions related to
3 hate mail received by the plaintiff.
4

5 ☐ Provide all internal Riot Games documents discussing harassment or a toxic
6 workplace culture related to Arcane's development.
7

8 **8. Procedural & Legal Accommodations**

9 ☐ Ensure the plaintiff's legal disability accommodations and pro se status are
10 acknowledged.
11

12 ☐ Provide all Riot Games communications discussing procedural delays or efforts
13 to exhaust the plaintiff legally.
14

15 Add notes...

1 **9. Witness & Expert Testimonies**

2 ☐ Provide a full list of individuals who worked on Arcane, their roles, and their
3 availability for testimony.
4

5 ☐ Provide any independent third-party forensic experts who can verify metadata
6 and authorship claims.
7

8 ☐ Provide witnesses from literary agencies who can confirm ownership of
9 Bloodborg.

10 **10. Additional Motions & Discovery Requests**

11 ☐ Grant the plaintiff access to Riot Games and Fortiche Production SAS servers
12 for forensic analysis.
13

14 ☐ Provide a timeline for employee interviews regarding Arcane's development.

15 ☐ Allow a neutral third party to conduct an anonymous questionnaire among Riot
16 Games and Fortiche employees about Arcane's development process.
17

18 ☐ Provide an official response to the court summons filed on 11 May 2024.

19 ☐ Provide a response to allegations regarding Christian Linke's public statements
20 condoning violence (e.g., "French Guillotine" comment).
21

22
23 Add notes...

1 **Final**

2 I have provided ample time for the opportunity to respond, comply, or refuse.

3 However, given the scope and breadth of the information, if extra time is needed, I understand,
4 so long as you effectively communicate this with me.
5

6 If you ignore or refuse the request, then I will be escalating the matter to the court.
7

8 Thank you for your cooperation.
9

10 The Plaintiff, Marc Wolstenholme, M.W. Wolf.

11 Date: February 5, 2025

12 Signed: *M.WOLSTENHOLME.*
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